## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NORTH CAROLINA RALEIGH DIVISION

IN RE:

ROBERT WILLIAM RIPLEY, KAREN MARY RIPLEY,

**CASE NO. 14-01265-5-DMW CHAPTER 13** 

**DEBTORS** 

## MOTION TO ALLOW DEBTORS TO FINANCE PURCHASE OF RESIDENTIAL REAL PROPERTY AND FEE APPLICATION

NOW COME the debtors, by and through their undersigned counsel, pursuant to Local Rule of Bankruptcy Procedure 4002-1(g)(5) and moves the Court to allow them to incur debt to finance the purchase of residential real property and in support of the Motion show the Court the following:

- 1. The debtors filed this chapter 13 case on March 4, 2014 and the plan was confirmed on May 30, 2014. The debtors have paid a total of \$4,315.00 to the Chapter 13 Trustee and are current on payments through November, 2017.
- 2. The debtors desire to incur debt to purchase a town home in Apex, North Carolina. The estimated closing date would be February 2018. The purchase price will not exceed \$290,000.00 and the monthly payment (including escrow for property taxes and insurance) will not exceed \$2,000.00 per month.
- 3. The debtors' attorney requests the presumptive non-base fee of \$200.00 in relation to this Motion to be paid as an administrative priority claim by the Chapter 13 Trustee.

WHEREFORE, debtors pray the Court as follows:

- 1. That the debtors be allowed to incur debt to finance the purchase of a town home costing no more than \$290,000.00 with monthly payments not to exceed \$2,000.00.
- 2. That the undersigned counsel be granted the presumptive non-base fee of \$200.00 to be paid as an administrative priority claim by the Chapter 13 Trustee.
  - 3. For such other and further relief as the Court deems just and proper.

Dated: November 7, 2017

/s/ Travis Sasser
Travis Sasser
Attorney for debtors

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## CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Motion and Fee Application was served on the entities listed below at their last known address with sufficient postage thereon, or, if such interested party is an electronic filing user, by serving such interested party, electronic transmission, pursuant to Local Rule 5005-4(9)(b).

Chapter 13, Trustee Served Electronically

Robert and Karen Ripley 211 Mayfield Drive Apex, NC 27539

I certify under penalty of perjury that the foregoing is true and correct.

Dated: November 7, 2017

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/s/ Travis Sasser
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